

# **Attachment 2**

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Form <b>1023</b> (Rev. September 1990) Department of the Treasury Internal Revenue Service	<b>Application for Recognition of Exemption</b> <b>Under Section 501(c)(3) of the Internal Revenue Code</b>	OMB No. 1545-0046 If exempt status is approved, this application will be open for public inspection, restriction, review.
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Read the instructions for each Part carefully.  
A User Fee must be attached to this application.  
If the required information and appropriate documents are not submitted along with Form 8718 (with payment of the appropriate user fee), the application may be returned to you.

**Part I Identification of Applicant**

1a Full name of organization (as shown in organizing document) <b>Benevolence International Foundation</b>		2 Employer identification number (if none, see instructions.) <b>Applied For</b>
1b c/o Name (if applicable) <b>Mr. Soliman J. Khudeira</b>	3 Name and telephone number of person to be contacted if additional information is needed <b>Wendy St. Watson Attorney (708) 440-0808</b>	
1c Address (number, street, and room or suite no.) <b>7810 S. Mayfield Avenue</b>	4 Month the annual accounting period ends <b>December</b>	
1d City or town, state, and ZIP code <b>Burbank, IL 60459</b>	5 Date incorporated or formed <b>3/3/92</b>	
6 Activity codes (See instructions.) <b>030 54</b>		7 Check here if applying under section: a <input type="checkbox"/> 501(c) b <input type="checkbox"/> 501(j) * c <input type="checkbox"/> 501(k)
8 Did the organization previously apply for recognition of exemption under this Code section or under any other section of the Code? If "Yes," attach an explanation.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9 Has the organization filed Federal income tax returns or exempt organization information returns? If "Yes," state the form numbers, years filed, and Internal Revenue office where filed.		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

No returns have been required as of yet.

**EO Determination Unit**

10 Check the box for your type of organization. BE SURE TO ATTACH A COMPLETE COPY OF THE CORRESPONDING DOCUMENTS TO THE APPLICATION BEFORE MAILING.

- a ☒ Corporation— Attach a copy of your Articles of Incorporation, (including amendments and restatements) showing approval by the appropriate State official; also include a copy of your bylaws.
- b ☐ Trust— Attach a copy of your Trust Indenture or Agreement, including all appropriate signatures and dates.
- c ☐ Association— Attach a copy of your Articles of Association, Constitution, or other creating document, with a declaration (see instructions) or other evidence the organization was formed by adoption of the document by more than one person; also include a copy of your bylaws.

If you are a corporation or an unincorporated association that has not yet adopted bylaws, check here ☐

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, including the accompanying schedules and attachments, and to the best of my knowledge it is true, correct, and complete.

Please Sign Here  Director (Title or authority of signer) **9/29/92** **9/5/1992** (Date)

For Paperwork Reduction Act Notice, see page 1 of the instructions.

Complete the Procedural Checklist (page 7 of the instructions) prior to filing.

CSB/EO UNIT

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**Part III Activities and Operational Information**

1. Provide a detailed narrative description of all the activities of the organization—past, present, and planned. Do not merely refer to or repeat the language in your organizational document. Describe each activity separately in the order of importance. Each description should include, as a minimum, the following: (a) a detailed description of the activity including its purpose; (b) when the activity was or will be initiated; and (c) where and by whom the activity will be conducted.

Operations have not yet begun. Directors are waiting for example: Lebanon

Benevolence International foundation has been organized to provide money and services to those who are in need. The founders of the organization intend to provide support for educational and medical institutions that service the needy. The organization intends to give money to those organizations that are truly in need of funding. Initially, the directors will ask religious organizations to suggest possible donees. The founders estimate that they will each contribute \$5,000 to the organization in order that the organization has the necessary means to attract other supporters. None of the directors shall receive compensation for their services. A minimal amount of operating expenses (i.e. office supplies, postage, telephone, professional fees, etc.) are expected to be incurred. Initial operations are expected to begin by July 1, 1992. The foundation, however, would like to begin operations approximately the same time as its operations in Canada begin.

The Foundation is currently applying for similar status in Canada. Mr. Farouq Malal, LL.B. at 38 Sweetland Avenue in Ottawa Canada is handling all of the legal work necessary for the foundation to operate in Canada.

The founders of the organization live abroad but travel to the United States on a regular basis. In their absence, Mr. Soliman W. Khudeira, a resident of Burbank, Illinois, handles all matters.

See 3-1-90

EO Determination Unit

2. What are or will be the organization's sources of financial support? List in order of size.

The organization's sources of financial support will be from its members and from friends as well as from fund raising activities.

3. Describe the organization's fundraising program, both actual and planned, and explain to what extent it has been put into effect. Include details of fundraising activities such as selective mailings, formation of fundraising committees, use of volunteers or professional fundraisers, etc. Attach representative copies of solicitations for financial support.

The organization intends to have fund raising by using mass mailings and other direct marketing methods.



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**Part III Activities and Operational Information (Continued)****4 Give the following information about the organization's governing body:****a** Names, addresses, and titles of officers, directors, trustees, etc.**b** Annual Compensation

1. Adel Abdul Jalil Batterjee 3. Mazin M. S. Bahareth  
Helmi Kutbi Abdul Rahman Alsidri  
Jeddah Saudi Arabia Jeddah Saudi Arabia
2. Shahir Abdulraof Batterjee  
El Seqafh  
Jeddah Saudi Arabia

NONE

**c** Do any of the above persons serve as members of the governing body by reason of being public officials or being appointed by public officials?☐ Yes ☒ No

If "Yes," name those persons and explain the basis of their selection or appointment.

**d** Are any members of the organization's governing body "disqualified persons" with respect to the organization (other than by reason of being a member of the governing body) or do any of the members have either a business or family relationship with "disqualified persons"? (See the specific instructions for line 4d.)☐ Yes ☒ No

If "Yes," explain.

**5** Does the organization control or is it controlled by any other organization?☐ Yes ☒ No

Is the organization the outgrowth of (or successor to) another organization, or does it have a special relationship with another organization by reason of interlocking directorates or other factors?

☐ Yes ☒ No

If either of these questions is answered "Yes," explain.

**6** Does or will the organization directly or indirectly engage in any of the following transactions with any political organization or other exempt organization (other than 501(c)(3) organizations): (a) grants; (b) purchases or sales of assets; (c) rental of facilities or equipment; (d) loans or loan guarantees; (e) reimbursement arrangements; (f) performance of services, membership, or fundraising solicitations; or (g) sharing of facilities, equipment, mailing lists or other assets, or paid employees?☐ Yes ☒ No

If "Yes," explain fully and identify the other organizations involved.

**7** Is the organization financially accountable to any other organization?☐ Yes ☒ No

If "Yes," explain and identify the other organization. Include details concerning accountability or attach copies of reports if any have been submitted.

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**Part III Activities and Operational Information (Continued)**

8. What assets does the organization have that are used in the performance of its exempt function? (Do not include property producing investment income.) If any assets are not fully operational, explain their status, what additional steps remain to be completed, and when such final steps will be taken. If "None," indicate "N/A."

N/A

- 9a. Will any of the organization's facilities or operations be managed by another organization or individual under a contractual agreement?

☐ Yes☒ No

- b. Is the organization a party to any leases?

☐ Yes☒ No

- If either of these questions is answered "Yes," attach a copy of the contracts and explain the relationship between the applicant and the other parties.

10. Is the organization a membership organization?

☒ Yes☐ No

If "Yes," complete the following:

- a. Describe the organization's membership requirements, and attach a schedule of membership fees and dues.

The only membership requirement is that the individual be of good reputation. There are no set fees or dues. Rather, any contribution regardless of size is accepted.

- b. Describe your present and proposed efforts to attract members, and attach a copy of any descriptive literature or promotional material used for this purpose. Please see attached sheet.

- c. What benefits do (or will) your members receive in exchange for their payment of dues?

Members will not receive any monetary benefits from their payment of dues. Rather, they will be doing acts of good deeds. They will be bettering the lives of other people and can feel better about themselves for helping others.

- 11a. If the organization provides benefits, services or products, are the recipients required, or will they be required, to pay for them?

☒ N/A☐ Yes☐ No

If "Yes," explain how the charges are determined, and attach a copy of your current fee schedule.

- b. Does or will the organization limit its benefits, services or products to specific individuals or classes of individuals?

☒ N/A☐ Yes☐ No

If "Yes," explain how the recipients or beneficiaries are or will be selected.

12. Does or will the organization attempt to influence legislation?

☐ Yes☒ No

If "Yes," explain. Also, give an estimate of the percentage of the organization's time and funds which it devotes or plans to devote to this activity.

13. Does or will the organization intervene in any way in political campaigns, including the publication or distribution of statements?

☐ Yes☒ No

If "Yes," explain fully.



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**Part III Technical Requirements**

1 Are you filing Form 1023 within 15 months from the end of the month in which you were created or formed? ☒ Yes ☐ No  
If you answer "Yes," do not answer questions 2 through 6.

2 If one of the exceptions to the 15-month filing requirement shown below applies, check the appropriate box and proceed to question 7.

Exceptions—You are not required to file an exemption application within 15 months if the organization:

- ☐ (a) is a church, interchurch organization, local unit of a church, a convention or association of churches, or an integrated auxiliary of a church;
- ☐ (b) is not a private foundation and normally has gross receipts of not more than \$5,000 in each tax year; or
- ☐ (c) is a subordinate organization covered by a group exemption letter, but only if the parent or supervisory organization timely submitted a notice covering the subordinate.

3 If you do not meet any of the exceptions in question 2, do you wish to request relief from the 15-month filing requirement? ☐ Yes ☐ No

4 If you answer "Yes" to question 3, please give your reasons for not filing this application within 15 months from the end of the month in which your organization was created or formed. (See the Instructions before completing this item.)

5 If you answer "No" to both questions 1 and 3 and do not meet any of the exceptions in question 2, your qualification as a section 501(c)(3) organization can be recognized only from the date this application is filed with your key District Director. Therefore, do you want us to consider your application as a request for recognition of exemption as a section 501(c)(3) organization from the date the application is received and not retroactively to the date you were formed? ☐ Yes ☐ No

6 If you answer "Yes" to question 5 above and wish to request recognition of section 501(c)(4) status for the period beginning with the date you were formed and ending with the date your Form 1023 application was received (the effective date of your section 501(c)(3) status), check here ☐ and attach a completed page 1 of Form 1024 to this application.

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**Part III Technical Requirements (Continued)****7** Is the organization a private foundation?

- ☐ Yes. (Answer question 8.)
- ☒ No. (Answer question 9 and proceed as instructed.)

**8** If you answer "Yes" to question 7, do you claim to be a private operating foundation?

- ☐ Yes. (Complete Schedule E.)
- ☐ No.

After answering this question, go to Part IV.

**9** If you answer "No" to question 7, indicate the public charity classification you are requesting by checking the box below that most appropriately applies:**THE ORGANIZATION IS NOT A PRIVATE FOUNDATION BECAUSE IT QUALIFIES:**

- (a) ☐ As a church or a convention or association of churches (CHURCHES MUST COMPLETE SCHEDULE A). Sections 509(a)(1) and 170(b)(1)(A)(i)
- (b) ☐ As a school (MUST COMPLETE SCHEDULE B). Sections 509(a)(1) and 170(b)(1)(A)(ii)
- (c) ☐ As a hospital or a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital (MUST COMPLETE SCHEDULE C). Sections 509(a)(1) and 170(b)(1)(A)(iii)
- (d) ☐ As a governmental unit described in section 170(c)(1). Sections 509(a)(1) and 170(b)(1)(A)(v)
- (e) ☐ As being operated solely for the benefit of, or in connection with, one or more of the organizations described in (a) through (d), (g), (h), or (i) (MUST COMPLETE SCHEDULE D). Section 509(a)(3)
- (f) ☐ As being organized and operated exclusively for testing for public safety. Section 509(a)(4)
- (g) ☐ As being operated for the benefit of a college or university that is owned or operated by a governmental unit. Sections 509(a)(1) and 170(b)(1)(A)(iv)
- (h) ☐ As receiving a substantial part of its support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public. Sections 509(a)(1) and 170(b)(1)(A)(v)
- (i) ☒ As normally receiving not more than one-third of its support from gross investment income and more than one-third of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions). Section 509(a)(2)
- (j) ☐ We are a publicly supported organization but are not sure whether we meet the public support test of block (h) or block (i). We would like the Internal Revenue Service to decide the proper classification. Sections 509(a)(1) and 170(b)(1)(A)(vi) or Section 509(a)(2)

If you checked one of the boxes (a) through (i) in question 9, go to question 14.

If you checked box (g) in question 9, go to questions 11 and 12.

If you checked box (h), (i), or (j), go to question 10.